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Wayans Bros. Productions, and
St. Martin's Press, LLC

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

JARED EDWARDS,

Plaintiff

vs.

KEENEN IVORY WAYANS,
SHAWN WAYANS, MARLON
WAYANS, WAYANS BROTHERS
PRODUCTIONS, AND ST.
MARTIN'S PRESS, INC.,

Defendants.

CASE NO. 2:10-cv-02231 R (RCX)

Honorable Manuel Real,
Courtroom 8, USDC - Central District

**DEFENDANTS' PROPOSED VOIR
DIRE QUESTIONS**

Trial Date: July 12, 2011

DEFENDANTS Keenen Ivory Wayans, Shawn Wayans, Marlon Wayans, Wayans Bros. Productions, and St. Martin's Press, LLC (collectively, the "Defendants") respectfully submit the following topics for voir dire:

1. Is there anyone here who is related to, or knows, any of the lawyers in the case, the plaintiff Jared Edwards or the defendants, Keenen Ivory Wayans, Marlon Wayans, Shawn Wayans or St. Martin's Press? Is there anyone here who is related to, or knows, any of the following people who may testify at trial?

- Elizabeth Bier
- Hayachira (Hachy) Mendez
- Darren Huang
- Bruce Fine
- Michael Tiddes
- Shane Miller
- Rene McDaniel
- Nancy (Ahyoung) Kim
- Jay Glick
- Kimberly Logan
- Xavier Cook
- Julian Cook
- Scott Williams
- Ron Sierra
- Rick Alvarez

2. Other than what you have heard in the brief description given today of the case, does anyone know or has anyone heard anything about this case?

3. Have you heard of any other lawsuits involving any of the parties (Jared Edwards, Marlon Wayans, Shawn Wayans, Keenen Ivory Wayans, Wayans Bros. Productions, or St. Martin's Press, LLC)?

1 4. The book at issue in this case is an illustrated joke book entitled *101*
2 *Ways to Know that You're a Golddigger*. Does anyone know what the term
3 “Golddigger” refers to?

4 5. The book portrays women who date or marry men for money in a
5 humorous, but often times crude manner. During the course of trial, you may hear
6 jokes and see illustrations that some may find offensive. The illustrations often
7 portray women in suggestive or sexy ways. Would anyone be offended by having to
8 look at these illustrations or listen to the jokes during trial?

9
10 ***Individual Voir Dire Questions for Each Juror***

11 1. What part of LA do you live in?

12 2. What is your marital status?

13 3. What is the highest level of education you have attained? For example,
14 high school, college, graduate school? If you received a degree, what type of degree
15 did you receive?

16 4. What is your current occupation? How long have you had that job?
17 Have you ever worked in the entertainment business? For example, at a talent
18 agency, on a movie set, or for a studio? What was your position? How long did you
19 have that job?

20 5. What is the occupation of your spouse and any other people who live
21 with you?

22 6. Prior jury service (federal and state civil and criminal cases, as well as
23 grand jury). Without revealing the outcome of the case, describe your experience as a
24 juror.

25 7. Have you or any relatives or close friends ever been involved as a party
26 in any civil lawsuit (personally as well as in connection with any employment).
27 What type of case where you, your relative or close friend involved in (automobile
28

1 accident, divorce, contract dispute)? Were you a plaintiff or a defendant? Were you
2 satisfied with the result of that case?

3 8. What do you think of the saying “Actions speak louder than words”?

4 9. Have you ever been given an opportunity that you regret not taking? If
5 so, why?
6
7

8 SUBMITTED BY:
9

10 Dated: July 5, 2011

FREEDMAN & TAITELMAN, LLP

11
12 By: /s/
Jesse A. Kaplan, Esq.
September Rea, Esq.
13 Attorneys for Defendants Keenen Ivory
Wayans, Shawn Wayans, Marlon Wayans,
14 Wayans Bros. Productions, and St. Martin’s
Press, LLC
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